



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No. 24-cr-49-jdp

STELIO KALKOUNOS,

18 U.S.C. § 1591(a)(1), (b)(2), (c)  
18 U.S.C. § 1594(d)  
18 U.S.C. § 2251(a)  
18 U.S.C. § 2253

Defendant.

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THE GRAND JURY CHARGES:

COUNT 1

From on or about July 16, 2023, to on or about March 1, 2024, in the Western District of Wisconsin and elsewhere, the defendant,

STELIO KALKOUNOS,

knowingly recruited, enticed, and obtained, by any means, "Jane Doe," in and affecting interstate commerce, having had a reasonable opportunity to observe "Jane Doe," and knowing, and in reckless disregard of the fact, that "Jane Doe" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), & (c)).

COUNT 2

On or about November 20, 2023, in the Western District of Wisconsin and elsewhere, the defendant,

STELIO KALKOUNOS,

knowingly and intentionally employed, used, persuaded, induced, enticed, and coerced a minor, "Jane Doe," to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depictions would be transported using any means and facility of interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 2251(a)).

FORFEITURE ALLEGATION

1. As a result of the offense charged in Count 1 of this indictment, and upon conviction for violating Title 18, United States Code, Section 1591(a), pursuant to Title 18, United States Code, Section 1594(d), the defendant,

STELIO KALKOUNOS,

shall forfeit to the United States his right, title, and interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation.

2. As a result of the offense charged in Count 2 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2251(a), pursuant to Title 18, United States Code, Section 2253, the defendant,

STELIO KALKOUNOS,

shall forfeit to the United States his right, title, and interest in:

(1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained, and

(2) any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense.

A TRUE BILL

  
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PRESIDING JUROR

Indictment returned: 2024-05-15

  
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TIMOTHY M. O'SHEA  
United States Attorney